

EXECUTIVE OFFICER SUMMARY REPORT
May 11, 2005

ITEM: 5

SUBJECT: NPDES PERMIT RENEWALS: SOUTHERN CALIFORNIA EDISON, SAN ONOFRE NUCLEAR GENERATING STATION (Hashim Navrozali):

- a. WASTE DISCHARGE REQUIREMENTS FOR THE SOUTHERN CALIFORNIA EDISON, SAN ONOFRE NUCLEAR GENERATING STATION, UNIT 2, SAN DIEGO COUNTY (TENTATIVE ORDER NO. R9-2005-0005, NPDES PERMIT NO. CA0108073)
- b. WASTE DISCHARGE REQUIREMENTS FOR THE SOUTHERN CALIFORNIA EDISON, SAN ONOFRE NUCLEAR GENERATING STATION, UNIT 3, SAN DIEGO COUNTY (TENTATIVE ORDER NO. R9-2005-0006, NPDES PERMIT NO. CA0108181)

PURPOSE: To provide the Regional Board the opportunity to review comments received and responses to comments, and consider modifications to tentative Order Nos. R9-2005-0005 and R9-2005-0006.

PUBLIC NOTICE: The NPDES permits hearing notice was published in the San Diego Union-Tribune and Orange County Register newspapers on January 28, 2005 for the Regional Board meeting scheduled for March 9, 2005. Copies of the tentative Orders were mailed on January 28, 2005 to the discharger and to all known interested parties and agencies. Copies were made available for public review at the Regional Board office on January 28, 2005. The tentative Orders were also posted on the Regional Board's website on January 28, 2005.

These actions served as the 30-day official public notification, as required by Title 40, Section 124.10 of the Code of Federal Regulations.

DISCUSSION: Tentative Order Nos. R9-2005-0005 and R9-2005-0006 (Waste Discharge Requirements for Southern California Edison, San Onofre Nuclear Generating Station, Units 2 and 3, San Diego County) renew and update NPDES Permit Nos. CA0108073 and CA0108181 and supersede the current NPDES permits, Order Nos. 99-47 and 99-48, in their entirety.

During its regularly scheduled meeting on March 9, 2005, the Regional Board heard oral public testimony regarding the tentative Orders but decided to extend the written comments period on the tentative Orders through March 23, 2005. The Regional Board directed staff to respond to all verbal and written comments received and bring the tentative Orders back for the Regional Board's consideration at a future hearing.

The comment letters received regarding the tentative Orders are attached with this Agenda Mailing (see Supporting Document Nos. 7 through 16).

Regional Board staff has prepared a *Response to Comments* document that addresses both oral and written comments received regarding the tentative Orders (see Supporting Document No. 18).

Based on the comments received, staff will be recommending changes to the tentative Orders as deemed appropriate. An *Errata Sheet* reflecting revisions to the initial versions of the tentative Orders and Fact Sheet will be prepared and provided to Regional Board members in the Supplemental Agenda Mailing.

KEY ISSUES:

1. The diversion of effluent from Unit 1 to the Unit 2 or 3 Outfalls (i.e. Outfalls 002 or 003).
2. The requirement for the Discharger to perform a *Comprehensive Demonstration Study* to demonstrate that Units 2 and 3 meet the technology and/or restoration compliance alternatives of the CWA Section 316(b) (Intake Structures) *Phase II* rule.
3. The removal of acute toxicity effluent limitations (pursuant to 2001 Ocean Plan provisions).
4. The discontinuation of the requirement for the Discharger to conduct periodic bacterial monitoring of receiving waters.
5. The discontinuation of the requirement for the Discharger to conduct periodic offshore transmissivity monitoring.
6. SCE's request to consolidate the waste discharge requirements for Units 2 and 3 under one NPDES permit in order to reduce their annual fees.

LEGAL CONCERNS:

None.

SUPPORTING
DOCUMENTS:

1. Location map.
2. Tentative Order No. R9-2005-0005 with Monitoring and Reporting Program.
3. Tentative Order No. R9-2005-0006 with Monitoring and Reporting Program.
4. Fact Sheet for tentative Order Nos. R9-2005-0005 and R9-2005-0006.
5. Copy of transmittal letter for tentative Orders, dated January 8, 2005.
6. Affidavit of Publication for newspaper public notices in the San Diego Union Tribune and Orange County Register newspapers, dated January 28, 2005.
7. Copy of Southern California Edison's comment letter, dated February 24, 2005.
8. Copy of San Diego Bay Council's first comment letter, dated March 8, 2005.
9. Copy of Industrial Environment Association's comment letter, dated March 8, 2005.
10. Copy of City of San Diego Deputy Mayor, Michael Zucchet's comment letter, dated March 15, 2005.
11. Copy of San Diego Bay Council's second comment letter, dated March 21, 2005.
12. Copy of U.S. Fish and Wildlife Service's comment letter, dated March 22, 2005.
13. Copy of Environmental Health Coalition and Nuclear Information and Resource Service's comment letter, dated March 23, 2005.
14. Copy of Department of Fish and Game's comment letter, dated March 23, 2005.
15. Copy of Plotkin and Associates' comment letter, dated February 1, 2005.
16. Copy of Wild Heritage Planners' comment letter, dated March 15, 2005.
17. Copy of Southern California Edison's letter dated March 22, 2005 which responds to the comments made by San Diego Bay Council regarding the tentative Orders in its letter dated March 8, 2005.
18. *Response to Comments* document, dated April 28, 2005.

COMPLIANCE
RECORD:

In October 2000, the discharge from the Unit 1 sewage treatment plant violated the effluent limitation for total suspended solids three times. SCE was issued an Administrative Civil Liability Complaint in the amount of \$9,000. SCE waived its right to a hearing and paid the liability.

Monitoring of the low volume waste from the Unit 2 Blowdown Processing Sump (BPS), on February 5, 2001, indicated an oil and grease value of 27.5 mg/l. This exceeded the instantaneous maximum oil and grease discharge limitation of 20 mg/l. This constituted a violation of Order No. 99-47. The monthly average oil and grease value for February 2001 from the Unit 2 BPS was 17.0 mg/l. This exceeded the monthly average grease and oil discharge limitation of 15 mg/l. This also constituted a violation of Order No. 99-47. A staff enforcement letter was subsequently issued to SCE on March 26, 2004, noting the violations.

An intrusion of red sea grass and mud clogged the traveling screens at Unit 3 on June 6, 2004. This resulted in very high differential circulating water pressure, necessitating a manual shut down of Unit 3. During the shut down process, the maximum delta T (incremental temperature of discharge above that of ambient receiving water) for Unit 3 exceeded 25 degrees F, for a period of approximately eight minutes. This constituted a violation of Order No. 99-48. A Notice of Violation was issued to SCE on August 19, 2004, noting the violation. No further enforcement action was taken regarding this violation.

Monitoring of the low volume waste from the High Flow Make-Up Demineralizer (HFMUD), on January 11, 2005, indicated a total suspended solids (TSS) concentration of 394 mg/l. This exceeded the instantaneous maximum TSS discharge limitation of 100 mg/l. Since the discharge from the HFMUD was discharged simultaneously to Outfalls 002 and 003 this constituted a violation of Order Nos. 99-47 and 99-48. SCE indicated that the high TSS value was due to a release of resin from the HFMUD unit. The resin release was caused by a mispositioned valve. SCE has indicated that since that event, operator training has been conducted and design changes are being considered to prevent TSS violations in the future. Staff is in the process of issuing a Notice of Violation to SCE noting the violation.

No additional effluent limitation violations of Order Nos. 99-47 or 99-48 have been noted in the last five years.

RECOMMENDATION:

Adopt tentative Order Nos. R9-2005-0005 and R9-2005-0006 as amended.